

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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March 24, 2025

**Via ECF and Email**

Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Thomas Brandenstein  
24 Cr. 121 (LAK)**

Dear Judge Kaplan,

The parties appeared for a status conference before the Court on February 26, 2025. At that appearance, we advised Your Honor that the defense was planning to appeal to the mitigation committee at the United States Attorney's Office (USAO) as part of our ongoing plea negotiations in this case. The appeal is now complete and the defense was advised of the USAO's decision. In accordance with that decision, the defense has requested that the government provide us with a plea agreement for our review.

Therefore, we ask for a 30-day adjournment of the next status conference, currently scheduled for March 26, 2025. The requested adjournment will enable us to receive and review the formal plea offer, with the assistance of a German-language interpreter. The government, by Assistant United States Attorney Mitzi Steiner, consents to this request.

Thank you for your consideration.

Respectfully submitted,  
/s/  
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